

THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

DAVID J. CATANZARO,
286 Upper Powderly Street
Carbondale, Pennsylvania 18407

Plaintiff,

VS.

LYKART TECHNOLOGIES LLC,
GROWKART, TRANSFORM SR
BRANDS LLC, KMART, KMART.COM,
SEARS, SEARS.COM, ALPHABET
INC., GOOGLE LLC, YOUTUBE.COM,
POSHMARK INC., STL PRO, INC.,
TARGET CORPORATION,
TARGET.COM, TOTALHILL.COM,
MICROSOFT CORPORATION, INC.,
APPLE INC. and MOZILLA
CORPORATION

Defendants.

Case No. 3:22-cv-1754

Judge Joseph F. Saporito, Jr.

Referred to: Phillip J. Caraballo

JURY TRIAL DEMANDED

FILED
SCRANTON

MAR 05 2025

PER 
DEPUTY CLERK

NOTICE OF ERRATA

Plaintiff, David J. Catanzaro, hereby submits this Notice of Errata regarding the Proposed Fourth Amended Complaint (the "Proposed Document"), which was filed on March 4, 2025 [ECF 50] along with Plaintiff's Motion for Leave to File Fourth Amended Complaint [ECF 49]. The Proposed Forth Amended Complaint contains the following typographical and numerical errors, which Plaintiff seeks to correct:

I Typographical Errors

1. Title Page

The word **"Forth"** is misspelled in the title of the Proposed Complaint. The correct spelling should be **"Fourth"**.

In the fourth line in the first paragraph below the title after the word Mozilla the word **"Corporation"** has been added.

2. PARTIES (section)

The comma (",") and the word **"US"** in point 4 is removed. The word **"principle"** is misspelled in points 4 through 11. The correct spelling should be **"principal"**.

3. RELEVANT MATTER (section)

The word **"defended"** is misspelled in point 21. The correct spelling should be **"defendant"**.

II Numerical Errors – Prayer for Relief, Point D Starting at point 1.

1. **"(25%)"** is now corrected denoting **"(25.01%)"**
2. **"(33.3%)"** is now corrected denoting **"(33.33%)"**
3. **"\$75 million (25%)"** is now corrected denoting **"\$60 million (20%)"**
4. **"\$50 million (16.7%)"** is now corrected denoting **"\$40 million (13.33%)"**
5. **"(8.3%)"** is now corrected denoting **"(8.33%)"**

These corrections do not alter the substantive claims or allegations in the complaint.

A Corrected Proposed Fourth Amended Complaint reflecting these changes has Been submitted [ECF 52].

Plaintiff respectfully requests that the Court accept the corrected version of the Proposed Fourth Amended Complaint in place of the originally proposed version. No prejudice will result from this correction, as no ruling has been issued on Plaintiff's

Motion for Leave to Amend.

Date March 5, 2025

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David J. Catanzaro", is written over a horizontal line.

— David J. Catanzaro
Plaintiff *pro se*
286 Upper Powderly Street
Carbondale, PA 18407
Phone: (570) 936-9262
E-mail: davidjosephus@aol.com

CERTIFICATE OF SERVICE

I, David J. Catanzaro, hereby certify that on March 5, 2025 I have served a true and correct copy of Plaintiff's NOTICE OF ERRATA to the following parties via electronic mail, where available, and otherwise by first-class mail:

Lykart Technologies, LLC, and GrowKart
30 N Gould St Suite 5707
Sheridan, WY 82801, US

John V. Gorman MORGAN,
LEWIS & BOCKIUS LLP
2222 Market Street
Philadelphia, PA 19103
john.gorman@morganlewis.com

Bridget E. Montgomery,
ECKERT SEAMANS CHERIN & MELLOTT, LLC
213 Market Street, 8th Floor
Harrisburg, PA 17101
bmontgomery@eckertseamans.com


Target Corporation & Target.com
1000 Nicollet Mall, Minneapolis,
Minnesota, 55403

Microsoft Corporation, Inc.
One Microsoft Way,
Redmond, WA 98052

Apple Inc.
One Apple Park Way
Cupertino, CA 95014

Mozilla Corporation
149 New Montgomery Street, 4th Floor,
San Francisco, CA 94105.

Date March 5, 2025


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